

**E
X
H
I
B
I
T

A**

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CASE NO. 1:12-cv-2296-TCB

Securities and Exchange Commission,

Plaintiff,

vs.

Aubrey Lee Price, PFG, LLC, PFGBI,
LLC, Montgomery Asset Management,
LLC f/k/a PFG Asset Management,
Montgomery Asset Management, LLC
f/k/a PFG Asset Management,

Defendants.

_____/

Genworth Life Insurance Company,
Protective Life Insurance Company,
Household Life Insurance Company,

Plaintiffs in Intervention,

vs.

Melanie E. Damian, as Receiver for the
Estate of Aubrey Lee Price, PFG, LLC,
PFGBI, LLC, Montgomery Asset
Management, LLC f/k/a PFG Asset
Management, Montgomery Asset
Management, LLC f/k/a PFG Asset
Management,

Defendant in Intervention.

_____ /

FIRST SUPPLEMENTAL RULE 26 DISCLOSURES OF MELANIE E. DAMIAN, AS RECEIVER FOR THE ESTATE OF AUBREY LEE PRICE, PFG, LLC, PFGBI, LLC, MONTGOMERY ASSET MANAGEMENT, LLC F/K/A PFG ASSET MANAGEMENT

Melanie E. Damian, as Receiver for the Estate of Aubrey Lee Price, PFG, LLC, PFGBI, LLC, Montgomery Asset Management, LLC f/k/a PFG Asset Management (Florida limited liability company), Montgomery Asset Management, LLC f/k/a PFG Asset Management (Georgia limited liability company), Defendant in Intervention ("Defendant," or the "Receiver") to the Complaints of Protective Life Insurance Company ("Protective"), Genworth Life Insurance Company ("Genworth"), and Household Life Insurance Company ("Household") (collectively, the "Plaintiffs" or the "Insurers"), and hereby submits her First Supplemental Disclosures pursuant to L.R. 26.1, L.R. 84.1, and Fed.R.Civ.P. 26(a)(1)(A)(i) and 26(a)(1)(A)(ii):

FED. R. CIV. P. 26(a)(1)(A)(i)
Individuals and Entities Likely to Have Discoverable Information

The following persons and/or entities may have discoverable information that the Receiver may use to support her claims and defenses:

1. **Sergeant Aaron Pritchett**
Lowndes County Sheriff's Department
120 Prison Farm Road
Valdosta, Georgia 31601
Telephone: (229) 671-2900

Sergeant Pritchett may have information relating to the investigation of the presumptive death of Aubrey Lee Price and Genworth's

investigation of the Receiver's claim for benefits under the Genworth policy.

2. Any records custodians necessary to authenticate any exhibits listed by the Receiver and/or Genworth, Athene, or HSBC.

FED. R. CIV. P. 26(a)(2)

Expert Witnesses

The Receiver may use the following expert witnesses at trial:

1. **Melissa Davis**
KapilaMukamal
Kapila & Company
Certified Public Accountants
1000 South Federal Highway, Suite 200
Fort Lauderdale, Florida 33316
Telephone: (954) 761-1011

Ms. Davis may provide expert information through a report and/or testimony at trial relating to the amount of death benefits from Genworth, Athene, and HSBC remaining in the Receiver's account as of December 31, 2103.

2. **Donald Dinsmore, JD AIC, P&CCLA**
Dinsmore Consulting
1289 Fordham Boulevard
Suite A-175
Chapel Hill, NC 27514-6110
Telephone: (919) 593-1134

Mr. Dinsmore may provide expert information through a report and/or testimony at trial relating to the investigation of fraud and/or fraudulent insurance claims, the investigation of the claim, Genworth, Athene, and HSBC's claim practices, and relevant industry standards including but not limited to the investigation of presumptive death claims.

FED. R.CIV.P. 26(a)(1)(B)(ii)

Documents That May Be Used to Support the Receiver's Claims

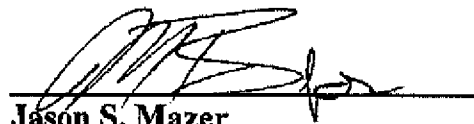
The Receiver makes the following supplemental disclosures of categories of documents:

3. All documents relied on by Ms. Davis to render her expert opinion in this matter.
4. All documents relied upon by Mr. Dinsmore to render his expert opinion in this matter.
5. All documents in the possession of Sergeant Aaron Pritchett and/or the Lowndes County, Georgia Sheriff's Department relating to the investigation of the presumptive death of Aubrey Lee Price.

The Receiver reserves the right to supplement her initial and supplemental disclosures as discovery progresses and facts and/or documents supporting her claims become known.

Respectfully submitted,

VER PLOEG & LUMPKIN, P.A



Jason S. Mazer

Florida Bar No. 0149871

jmazer@vpl-law.com

Matthew L. Baldwin

Florida Bar No. 27463

mbaldwin@vpl-law.com

100 S.E. 2nd Street, 30th Floor

Miami, Florida 33131

Telephone: (305) 577-3996

Facsimile: (305) 577-3558
*Special Insurance Counsel for the
Receiver,
Admitted Pro Hac Vice*

and

DAMIAN & VALORI, LLP
Kenneth Dante Murena, P.A.
Florida Bar No. 147486
kmurena@dvllp.com
Guy F. Giberson, P.A.
Florida Bar No. 627402
ggiberson@dvilp.com
1000 Brickell Avenue, Suite 1020
Telephone: (305) 371-3960
Facsimile: (305) 371-3965
*Counsel for the Receiver,
Admitted Pro Hac Vice*

and

**PETITT WORRELL CRAINE
WOLFE, LLC**
Andrew Worrell, Esquire
Georgia Bar No. 311027
Andrew@petittworrell.com
Suite 1030, One Glenlake
1 Glenlake Parkway
Atlanta, Georgia 30328
Telephone: (404) 249-7480
Facsimile: (404) 442-4463
Co-Counsel for the Receiver

LOCAL RULE 7.1D CERTIFICATION

By signature below, counsel certifies that the foregoing document was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1B.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served *via* electronic mail this 30th day of September 2014 upon: all counsel of record identified on the attached Service List.

/s/ Matthew L. Baldwin

Matthew L. Baldwin

SERVICE LIST	
Madison Graham Loomis, Esq. W. Shawn Murnahan, Esq. Securities & Exchange Commission-GA 950 East Paces Ferry Road, N.E. Suite 900 Atlanta, Georgia 30326 Telephone: (404) 842-7600 Email: loomism@sec.gov Email: murnahanw@sec.gov <i>Securities and Exchange Commission</i>	Robert J. Waddell, Jr., Esq. Laura E. Reinhold, Esq. MCGUIRE WOODS, LLP Suite 2100, Promenade II 1230 Peachtree Street, N.E. Atlanta, Georgia 30309 Telephone: (404) 443-5500 Email: rwaddell@mcguirewoods.com Email: lreinhold@mcguirewoods.com <i>Counsel for FDIC</i>
Peter D. Muller GOODMAN MCGUFFEY LINDSEY & JOHNSON, LLP Suite 300 532 Stephenson Avenue Savannah, GA 31405-5987 Telephone: (912) 503-2170 pmuller@gmlj.com <i>Counsel for Receiver, Melanie Damian</i>	David J. Forestner, Esq. CARLTON FIELDS JORDEN BURT, P.A. One Atlantic Center, Suite 3000 1201 W. Peachtree Street Atlanta, Georgia 30309 Telephone: (404) 815-3400 Email: dforestner@cfjblaw.com <i>Counsel for Plaintiff in Intervention, Genworth Life Insurance Company</i>
Christopher C. Frost, Esq. C. Andrew Kitchen, Esq. Alexander B. Feinberg, Esq. MAYNARD, COOPER & GALE, P.C. 1901 Sixth Avenue North 2400 Regions Harbert Plaza Birmingham, Alabama 35203 Telephone: (205) 254-1186 Email: cfrost@maynardcooper.com Email: dkitchen@maynardcooper.com Email: afeinberg@maynardcooper.com <i>Counsel for Plaintiffs in Intervention, Protective Life Insurance Company and Household Life Insurance Company</i>	Raul Cuervo, Esq. CARLTON FIELDS JORDEN BURT, P.A. 100 S.E. 2 nd Street Suite 4200 Miami, Florida 33131 Telephone: (305) 530-0050 Email: rcuervo@cfjblaw.com <i>Counsel for Plaintiff in Intervention, Genworth Life Insurance Company</i>

<p>Alan Francis Curley ROBINSON CURLEY & CLAYTON, P.C. 300 South Wacker Drive Chicago, IL 60606 Telephone: (312) 663-3100 acurley@robinsoncurley.com <i>Counsel for Plaintiffs in Intervention, Genworth Life Insurance Company</i></p>	<p>Philip Keith Lichtman MILLS, PASKERT, DIVERS P.C. One Atlantic Center 1201 West Peachtree Street Suite 2610 Atlanta, GA 30309 Telephone : (404) 870-8200 klichtman@mpdlegal.com <i>Counsel for Plaintiffs in Intervention, St. Paul Mercury Insurance Company</i></p>
--	---